

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>CARRIE BAUER,</b>	§	
<b>STEPHANEY MAYFIELD,</b>	§	
<b>and ELIZABETH SUE</b>	§	
<b>Plaintiffs,</b>	§	
v.	§	
<b>Rufe Snow Investment, LLC., d/b/a IN-N-OUT GYROS and STOP-N-GO GYROS, and Ziad Massarwa, Individually</b>	§	<b>JURY DEMANDED</b>
<b>Defendants</b>	§	

**OFFER OF JUDGMENT**

Please accept this as a formal Offer of Judgment in accordance with Federal Rule of Procedure 68.

Defendant(s) Rufe Snow Investment, LLC, d/b/a IN-N-OUT GYROS and STOP-N-GO GYROS, and Ziad Massarwa (herein after referred to as "Defendants") hereby make this offer to pay Plaintiff Carrie Bauer, Stephaney Mayfeild and Elizabeth Sue (herein after referred to as "Plaintiffs") a settlement amount in accordance with this Offer of Judgment.

In compliance with Rule 68, Defendants make this offer more than 14 days before trial. Defendants offer to settle with Carrie Bauer, Stephaney Mayfield and Elizabeth Sue all of their claims asserted and that could have been asserted in their original complaints.

Defendants' offer a total sum of \$35,000.00 to settle all claims asserted or which could have been asserted by Plaintiffs against Defendants in the above referenced case (this amount to be divided between Plaintiffs at their discretion). This offer is for all monetary damages claims,

including attorney fees, costs of court and interest that was recoverable as of the date of this offer by Defendants. This offer will remain open for 14 days.

If this offer is not accepted by 5:00p.m. within 14 days from when it is received, it is deemed rejected and can serve as the basis for the recovery of Defendants litigation costs from Plaintiffs under Rule 68 of the Federal Rules of Civil Procedure.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing DEFENDANTS' OFFER OF JUDGMENT was filed with the Clerk via the CM/ECF Document Filing System and served upon counsel of record via the CM/ECF Notification email this 28<sup>th</sup> day of November, 2022 as follows:

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*/s/ Wes Dauphinot*  
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